

# EXHIBIT D

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' THIRD SET OF  
REQUESTS FOR PRODUCTION TO  
DEFENDANT FACEBOOK, INC.**

Judge: Hon. Vince Chhabria  
Courtroom: 4, 17th Floor

**REQUEST FOR PRODUCTION NO. 40**

Documents sufficient to identify all Databases or Data Warehouses which contain information about Facebook Users.

**REQUEST FOR PRODUCTION NO. 41**

All Documents relating to the deletion, loss, destruction or spoliation of any Documents or data responsive to any request for production propounded in this action.

**REQUEST FOR PRODUCTION NO. 42**

All Documents You relied upon in answering any interrogatory Plaintiffs propound in this action.

**REQUEST FOR PRODUCTION NO. 43**

All privilege logs, interrogatory responses, written reports, correspondence and deposition transcripts from any formal or informal inquiry or investigation by a governmental entity or regulator in the United States or United Kingdom relating to whether Facebook Users' Content and Information was accessed or obtained by any Third Parties without proper consent or authorization, including but not limited to all inquiries or investigations arising out of the Cambridge Analytica Scandal, the FTC Consent Order, and any inquiry or investigation related to the settlement agreement with the FTC announced on July 24, 2019.

**REQUEST FOR PRODUCTION NO. 44**

Documents sufficient to show all payments You received from all Third Party Apps or App developers who had access to the Content and Information of Friends of Installing Users in the United States or United Kingdom.